STOLL KEENON & PARK LLP

2650 AEGON CENTER | 400 WEST MARKET STREET | LOUISVILLE, KENTUCKY 40202-3377 (502) 568-9100 PHONE | (502) 568-5700 FAX | WWW.SKP.COM

C. KENT HATFIELD 502-568-5745 hatfield@skp.com

December 31, 2003

Mr. Thomas N. Dorman
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

RE: Case No. 2003-00360

Dear Mr. Dorman:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of Vulcan Materials Company "(Vulcan") Motion for Full Intervention. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me the enclosed, self-addressed stamped envelope.

Sincerely, C. Lew Halfel

C. Kent Hatfield

Counsel for Vulcan Materials Company

JAN 0 5 2004

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cc: Parties of Record

COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

PETITION OF DOE VALLEY)
UTILITIES, INC. FOR)
DETERMINATION AS TO)
JURISDICTIONAL STATUS OF) CASE NO. 2003-00360
DOE VALLEY UTILITIES, INC.)
AND ADDITIONAL OR)
ALTERNATIVE DETERMINATIONS)

MOTION OF VULCAN MATERIALS COMPANY FOR FULL INTERVENTION

Vulcan Materials Company ("Vulcan"), by counsel, hereby moves the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 Section 3(8) for full intervention in the above-captioned matter involving the petition of Doe Valley Utilities, Inc. ("Doe Valley") for determination as to jurisdictional status. The grounds in support of Vulcan's motion are set forth below.

- Vulcan is the owner of a mine which produces aggregate and other rock products in Meade County, Kentucky. Vulcan is currently a customer for water service of Doe Valley.
- 2. The Commission has previously provided notice to Vulcan of Doe Valley's petition and has recognized that Vulcan's interest may be affected by the outcome of this proceeding.
- 3. Vulcan's legal counsel for this matter are:

C. Kent Hatfield STOLL, KEENON & PARK, LLP 2650 AEGON Center 400 West Market Street Louisville, Kentucky 40202 (502) 568-9100 Lindsay Sinor Senior Attorney VULCAN MATERIALS COMPANY 1200 Urban Center Drive Birmingham, Alabama 35242 (205) 298-3205

- 4. Vulcan's interest in this proceeding is not represented adequately by any other party.
- 5. Vulcan's participation will present issues and develop facts which are of assistance to the Commission in its consideration of this matter. Vulcan's participation in this matter will not delay or disrupt this proceeding and will not prejudice the right s of any other party.

For the reasons set forth above, Vulcan's Motion for Full Intervention in this matter should be granted.

Respectfully submitted,

C. Kent Hatfield

STOLL, KEENON & PARK, LLP

2650 AEGON Center

400 West Market Street

Louisville, Kentucky 40202

(502) 568-9100

COUNSEL FOR VULCAN MATERIALS COMPANY

CERTIFICATE OF SERVICE

This is to certify that I have this 31st of December, 2003 caused to be served by United States mail a copy of the within and foregoing Motion to Intervene upon the following persons, properly addressed as follows:

C. Kent Halfield

Randall Benham 5791 Olin road Brandenburg, Kentucky 40108	Roy Dean Benham 5445 Olin Road Brandenburg, Kentucky 40108
Edith Harrington 250 Lakeshore Parkway Brandenburg, Kentucky 40108	Sharon Jones 200 Lakeshore Parkway Brandenburg, Kentucky 40108
Hon. Thomas A. Marshall 212 Washington St. P.O. Box 223 Frankfort, Kentucky 40601 tamarshall@mac.com	Hon. Holland N. McTyeire, V Greenebaum Doll & McDonald PLLC 3300 National City Tower 101 South Fifth St. Louisville, Kentucky 40202 hnm@gdm.com
Ms. Carol Nepi General Manager Doe Valley Utilities, Inc. #1 Doe Valley Parkway Brandenburg, Kentucky 40108 doevally@bbtel.com	Wayne Russell 210 Lakeshore Parkway Brandenburg, Kentucky 40108
Hon. Phillip J. Shepherd 307 West Main Street P.O. Box 782 Frankfort, Kentucky 40602 shepherd@mis.net	